GEORGE PAPADOPOULOS, CPA/PFS, CFP®

CLIENT BROCHURE

This Brochure provides information about the qualifications and business practices of George Papadopoulos, CPA/PFS, CFP®. If you have any questions about the contents of this Brochure, please contact the Adviser at (734) 929-6405 or via email at george@thefeeonlyplanner.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or any state securities authority. Registration does not imply a certain level of skill or training. Information about George Papadopoulos, CPA/PFS, CFP® is available on the SEC's website at www.adviserinfo.sec.gov.
George Papadopoulos', CPA/PFS, CFP® CRD number is: 121985
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March 14, 2024
Item 1: Cover Page

ITEM 2: MATERIAL CHANGES

George Papadopoulos, CPA/PFS, CFP® (or the "*Adviser*") has updated this Form ADV 2A Brochure on March 14, 2024, to provide the following updates:

Item 4.E: The Adviser's assets under management at the close of business on December 31, 2023 (fiscal year end), totaled $57,393,458 in 18 limited discretionary accounts. The managed assets are owned by individuals and high net worth individuals.

There are no material changes to report at this time.

The Adviser last updated its Form ADV 2A Brochure on March 14, 2024, to update its 2022 fiscal year end assets under management.

If you should have any questions or concerns relating to our services or the contents of this Brochure, please do not hesitate to contact me.

Sincerely,

George Papadopoulos, CPA/PFS, CFP®

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ITEM 4: ADVISORY BUSINESS

A. DESCRIPTION OF THE ADVISORY FIRM.

George Papadopoulos, CPA/PFS, CFP® (“*George Papadopoulos” or “Adviser”*) has been in the investment advisory business since January 1998 when the Adviser was initially registered with the State of Michigan.

The Adviser is a sole proprietorship formed in Michigan by its founder and Chief Compliance Officer, George Papadopoulos, CPA/PFS, CFP®. The Adviser is registered with and regulated by the State of Michigan’s Corporations, Securities and Commercial Licensing Bureau, Department of Licensing and Regulatory Affairs.

B. TYPES OF ADVISORY SERVICES

George Papadopoulos, CPA/PFS, CFP® offers **Wealth Management and Consultation Services.**

George Papadopoulos, CPA/PFS, CFP®, is a fee only Registered Investment Adviser. The term “*fee only*” means that the Adviser and its personnel do not accept commissions in connection with securities or insurance recommendations. The Adviser is compensated for advisory services only in the form of fees paid directly by clients.

The Adviser’s fees are based upon a percentage of assets under management; hourly or project-based fees, depending upon the services requested and scope of the engagement.

“Advisory Representatives” are those persons authorized by the firm to deliver financial and investment advisory services. George Papadopoulos, CPA/PFS, CFP® is the Adviser’s sole Advisory Representative. Mr. Papadopoulos is not a registered representative of a broker/dealer nor is he an independent insurance agent.

The Adviser is not a broker/dealer or custodial firm. Any transactions in securities will be executed by an unaffiliated custodial firm of clients’ choosing.

George Papadopoulos, CPA/PFS, CFP®, offers a complimentary general consultation to discuss services available, to give a prospective client time to review services desired, and to determine the possibility of a potential Client-Adviser relationship. Services begin only after the client and Adviser formalize the relationship with a properly executed Client Agreement.

1. Wealth Management Services. George Papadopoulos, CPA/PFS, CFP®, coordinates the delivery and implementation of personalized and comprehensive wealth management services. Wealth Management Services are ongoing in nature and focus on providing the client with comprehensive portfolio management, value-added and client-initiated financial planning services and for individual clients, preparation of the annual 1040 Federal Income tax return and State Income Personal Tax Return, as outlined in the engagement for services (not available for entities such as trusts, businesses, etc.).

An initial interview and data-gathering process is completed to determine the Client's stated needs, goals, time horizon and risk tolerance. The Adviser will prepare an individualized investment plan that includes analysis and recommendations.

Wealth Management Services include selection, implementation and on-going management of portfolios. Unless otherwise directed by the client, George Papadopoulos will generally seek to allocate a client's assets among various investments, taking into consideration the client's strategic portfolio framework developed with clients. The Adviser attempts to construct a diversified portfolio of investment recommendations that are within its realm of expertise. In each case, the stated individual needs, goals and desires of clients are taken into consideration.

The Adviser primarily recommends investments in exchange traded funds and mutual funds. Investments may also include short-term instruments (*i.e.,* money market funds, CD's, T-bills), stocks, bonds, or other investment vehicles. The Adviser provides limited discretionary management services with the proper authorization whereby the Adviser will implement recommendations and make investment changes within the approved investment selections.

Clients engaging investment advisory services are expected to play an active role. The Adviser requests clients to participate in the formation of the investment plan, the development of investment advice and recommendations and the ongoing services provided. In providing ongoing Wealth Management Services, the Adviser will manage investor funds in accordance with an investment plan / directives determined by the Adviser and the client. The Adviser will thereafter remain available for ongoing advice and recommendations.

Clients may call the office during regular business hours to discuss their portfolio or ask questions, but the Adviser recommends that clients initiate a meeting (in person or telephonically) with the Adviser no less than twice annually. *However, clients are obligated to immediately inform the Adviser of any changes in their financial situation to provide the Adviser with the opportunity to review the portfolio to ensure it is still structured to help meet the client's stated needs and objectives.*

Clients can expect to receive standard account statements from brokerage firms. The Adviser may prepare an annual investment performance report at the Adviser's discretion.

As a value-added service, the Adviser can incorporate client-initiated consultations on issues relating to components of financial planning such as income, estate planning and risk management using long-term strategies so that continuous monitoring is not required. Clients are responsible for initiating new and follow-up consultations. Services will not include preparation of a comprehensive written financial plan. Client is welcome to take no action in connection with financial planning advice or Client may implement recommendations in whole or in part via the service providers of the Client's choice.

George Papadopoulos, CPA/PFS, CFP® can tailor services to focus only on certain portfolio components pursuant to the client's stated directives and/or the nature of the engagement. Where advisory services or information are limited, clients must understand that comprehensive investment needs and or objectives may not be fully considered due to the client's option not to receive limited services, the lack of information received, and/or client disclosure.

While the Adviser may offer general advice on partnership investments, including hedge funds, private limited partnerships, etc., these services are limited to consultation regarding the investment opportunity and a review of the offering documents versus the management of the investments, unless specifically agreed to in writing.

Clients requiring assistance on issues relating to matters outside of financial and investment advisory topics should consult their personal tax adviser, legal counsel, or other professionals for expert opinions.

Services and investment recommendations in connection to assets invested in a corporate retirement plan are limited to those offered within the plan and via the plan's contracted service providers.

If services desired go outside the scope of Wealth Management Services, the Adviser may be available to provide Consultation Services. In such cases, the Adviser may request a new or amended Client Agreement and additional fees will apply. The Adviser will not engage in additional services without the client's direction.

Wealth Management Services are continuous in nature and thus are ongoing until terminated by either party.

2. Consultation Services may be general in nature or focused on particular areas of interest. These services are engaged on an hourly or project basis and terminate upon the delivery of services unless otherwise agreed in writing. Topics may range from particular investments, asset allocation, business consultation services, components of financial planning, risk management or other areas of interest. The Adviser can tailor services as desired by the client.

When Consultation Services only focus on certain areas of client interests, needs or are otherwise limited, clients must understand that a client's overall financial and investment needs, liabilities and objectives may not be considered as a result of time and/or service restraints placed on the Adviser's services. Clients requiring assistance on issues relating to matters outside of financial and investment advisory topics should consult their personal tax adviser, legal counsel, or other professionals for expert opinions.

When providing a review or advice on investments within retirement plans, the advice and any recommendations are limited to plan offerings and the service provider(s) selected by the plan providers.

Implementation of any advice or recommendations pertaining to securities or non-securities matters, in whole or in part, is entirely at the client's discretion via the service provider(s) of the client's choice.

Consultation Services will not include any portfolio monitoring, investment reviews or Wealth Management. Wealth Management Services may be available via a new client agreement.

Consultation Services terminate upon delivery unless otherwise agreed in writing. The advice provided by the Adviser may include recommendations for updates and reviews and it is the client's responsibility to secure additional services under a new or amended agreement, if desired.

C. CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

George Papadopoulos, CPA/PFS, CFP® focuses on providing individualized services. The Adviser can tailor services to focus only on certain portfolio components, depending upon the client's wishes and/or the nature of the engagement. However, where client services or information are limited, clients must understand that comprehensive financial and/or investment needs and objectives may not be fully considered due to the client's option to receive limited services, the lack of information received, and/or client disclosure.

The client and Adviser may complete a risk assessment or similar process, depending upon the nature of services to be provided. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs unless otherwise agreed by the Adviser in writing. Clients are welcome to set parameters on the Adviser's limited discretionary authority in writing as to types of investments and amounts purchased or sold.

Where clients retain authority to implement recommendations, they are welcome to do so, in whole or in part via the financial services provider(s) of their choice.

D. WRAP FEE PROGRAMS

George Papadopoulos, CPA/PFS, CFP® is not engaged as a wrap fee sponsor or manager. The Adviser does not recommend wrap fee programs.

E. AMOUNTS OF ASSETS UNDER MANAGEMENT

As of December 31, 2023 (fiscal year end), George Papadopoulos, CPA/PFS, CFP® managed $57,393,458 in 18 limited discretionary accounts. The managed assets are owned by individual and high net worth individual clients.

ITEM 5: FEES AND COMPENSATION

A. FEE SCHEDULES

George Papadopoulos, CPA/PFS, CFP® is only compensated for advisory services as follows: A percentage of assets under management, hourly fees and project-based (fixed) fees. The Adviser's project-based fees are dependent upon the nature and scope of the engagement and advisory billings are based upon the number of project hours, using the Adviser's hourly rate as a guide.

1. Fees for **Wealth Management Services** are agreed upon at the time of engagement and are based upon a percentage of assets as set forth on the following page and billed quarterly in advance. The Adviser's minimum annual fee is $10,000 ($2,500 quarterly). The quarterly fee is based upon the market value of the managed portfolio as determined by the client's custodian on the last trading day of the preceding calendar quarter and multiplied by ¼ of the annual percentage rate shown below. Client accounts are aggregated before performing the calculation.

Account Asset Value	Annualized Fee
First $1,000,000	1.00%
$1,000,001 and $2 Million	0.80%
$2,000,001 and $5 Million	0.60%
Over $5 Million	0.40%

The first payment is due and payable upon execution of the Wealth Management Agreement and will be assessed pro-rata if the Agreement is executed other than the first day of a calendar quarter. Subsequent payments are due and assessed on the first day of each calendar quarter.

The fee may be modified in certain situations as determined at the time of engagement and based upon the nature of services, complexity and nature of the portfolio, anticipated efforts, additional services provided, pre-existing relationships, special circumstances, and at the Adviser’s discretion. If an alternate fee has been determined based upon information presented by the Client it shall be noted in the Client Agreement.

In the event the Adviser agrees in writing to manage securities that do not have a readily available market value, the Adviser and Client agree to seek at least two independent resources for valuation services.

Should a client’s circumstances change during the course of our engagement such that additional effort and services are required, the Adviser may propose a fee adjustment with at least 30 days written notice. Clients are welcome to terminate services at any time.

The Adviser’s fee includes client-initiated financial planning consultations and where applicable, preparation of the annual 1040 Federal and State Income Personal Tax Returns. These are value-added services and therefore do not impact the Adviser’s Wealth Management fees. These services are non-transferrable, and clients do not qualify for any type of refund if the services are not utilized. George Papadopoulos, CPA/PFS, CFP® does not provide other accounting or tax services unless engaged for such services under a separate agreement.

The Adviser’s fee may be higher or lower than may otherwise be available through other investment firms for similar services.

In the rare event that Wealth Management clients desire services outside the scope of the Adviser’s engagement, George Papadopoulos, CPA/PFS, CFP® is available to provide additional services outside the scope of the Adviser’s engagement at the hourly consultation rate of $250. The Adviser will not engage in services resulting in additional fees without the expressed authorization of the client.

2. Fees for **Consultation Services** are invoiced at a rate of $250 per hour. For larger projects, the Adviser may propose a project-based fee, using the hourly rate as a guide. In such cases, the project fee will be based upon time and effort required and/or the nature and complexity of services.

The Adviser may request a retainer equal to one-half of the proposed project fee at the time of engagement with the balance due at the conclusion of services. In the alternative, fees are due at the conclusion of services.

Should the client's situation or conditions change during the course of services such that new advice, recommendations, re-evaluation or research are required, additional fees may apply. The Adviser will not engage in additional services that result in fees without the client's approval.

B. PAYMENT OF FEES

1. Unless otherwise agreed in writing, **Wealth Management fees** are payable quarterly in advance as outlined in this Brochure. Payment of Wealth Management fees may be made directly to the Adviser or through a debit directly to the client's account by the qualified custodian holding the client's funds and securities. The Adviser follows the following criteria when payment is made via a qualified custodian as required by the State of Michigan's Uniform Securities Act: 1) The client provides written authorization permitting the fees to be paid directly from the client's account held by the independent qualified custodian and the authorization is limited to withdrawing contractually agreed upon Investment Adviser fees; (2) The client will directly receive account statements directly from the qualified custodian which reflect the Adviser's fee deduction; (3) The frequency of fee withdrawal shall be specified in the written authorization/agreement; (4) The custodian of the account shall be advised in writing of the limitation on the Adviser's access to the account and; (5) The client shall be able to terminate the written billing authorization or agreement at any time.

It is important to note that custodial firms do not verify advisory fees. Therefore, clients should review their custodial statements carefully. If a client should have any questions or concerns in connection with an advisory fee deduction, the client should promptly contact George Papadopoulos, CPA/PFS, CFP®.

Where advisory fees are deducted via the custodian, it is vital that the custodian send account statements directly to the client. If at any time clients find they are not receiving their account statements, they should promptly notify the custodian and the Adviser.

If the designated account(s) do not contain sufficient funds to pay advisory fees, the client can leave standing orders to deduct fees via other accounts. In the absence of alternate instructions, the Adviser will issue an invoice for advisory fees to the client.

2. **Consultation** fees are invoiced directly. George Papadopoulos, CPA/PFS, CFP® may require a retainer equal to ½ the proposed project fee in order to schedule services. Otherwise, fees for services are payable in full at the conclusion of services.

C. FEES ASSOCIATED WITH INVESTING

Clients are responsible for the payment of all third-party fees associated with investing. Clients may pay transaction and brokerage commission to their broker/dealer or other service providers ("*Financial Institution[s])* as well as any fees associated with their particular accounts (e.g., account opening, maintenance, transfer, termination, wire transfer, retirement plan, trust fees, and all such applicable third party fees, deferred sales charges, odd lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

All fees paid to the Adviser for advisory services are separate from the fees and expenses charged to shareholders of ETF's or mutual fund shares offered by mutual fund companies. Such charges, fees and commissions are exclusive of and in addition to the Adviser's fees. A complete explanation of the expenses charged by an investment is contained in the investment prospectus. Clients are encouraged to read each prospectus and securities offering document. If a mutual fund previously purchased by or selected by a client should impose a sales charge, a client may pay an initial or deferred sales charge. George Papadopoulos, CPA/PFS, CFP® does not receive any portion of these investment-related fees.

D. PREPAYMENT OF FEES

George Papadopoulos, CPA/PFS, CFP® may require a pre-paid retainer for Consultation Services as described in this section. The Adviser collects fees for Wealth Management Services quarterly and in advance of services.

Prospective clients who do not receive the Adviser's Form ADV Part 2 Brochure at least 48 hours prior to engagement have the right to terminate the Adviser's services within 5 business days of signature without penalty (no fees due or prepaid fees will be promptly refunded). Alternatively:

Wealth Management Services are ongoing and therefore continue until terminated by either party or the Adviser receives proper notice of Client's death. Either party may immediately terminate services by written notice to the other. At termination, the Adviser will calculate and return a pro-rated refund of the pre-paid quarterly management fee as applicable.

Consultation Services terminate upon the delivery of services unless ongoing services are engaged pursuant to the Client Agreement. These services otherwise may be immediately terminated prior to the conclusion of services or may be terminated upon written notice from either party. The client will only be invoiced for time incurred by the Adviser up until the effective date of termination or any prepaid but unearned fees will be promptly refunded.

E. OTHER COMPENSATION FOR THE SALE OF SECURITIES OR OTHER INVESTMENT PRODUCTS TO CLIENTS

George Papadopoulos, CPA/PFS, CFP® is a fee-only Registered Investment Adviser. The Adviser is solely compensated via advisory fees paid by clients.

The Adviser does not accept any other forms of compensation or commissions for the recommendation of securities or non-securities products.

From time to time, the Adviser may review risk-management issues upon request. The Adviser is not insurance licensed. Clients are thereafter welcome to seek out the services of their preferred insurance services provider(s).

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

The Adviser's fees associated with services are not "performance based" (based upon a share of capital gains or capital appreciation, or performance, for any portion of funds under an advisory contract). Therefore, the Adviser does not engage in side-by-side management.

ITEM 7: TYPES OF CLIENTS AND MINIMUM CONDITIONS

The Adviser's services are available to individuals; pension and profit sharing plans; trusts, estates and charitable organizations; corporations or other business entities. At this writing however, the Adviser focuses its services solely on individual clients.

If an account is subject to the Employee Retirement Income Security Act of 1974, as amended, ("*ERISA*"), the Adviser acknowledges that Adviser is a fiduciary within the meaning of the Act and the ERISA Client is a named fiduciary with respect to the control or management of the assets in the Account. In each instance, the Client will agree to obtain and maintain a bond satisfying the requirements of Section 412 of ERISA and to include the Adviser and the Adviser's principals, agents, and employees under those insured under that bond and will deliver to the Adviser a copy of the governing plan documents. If the Account assets for which the Adviser provides services represent only a portion of the assets of an employee benefit plan, Client will remain responsible for determining an appropriate overall diversification policy for the assets of such plan.

The Adviser generally requires a minimum quarterly fee of $2,500 ($10,000 annually) for its Wealth Management Services.

The Adviser's fee may be modified in certain situations as determined at the time of engagement and based upon the nature of services, complexity and nature of the portfolio, anticipated efforts, additional services provided, pre-existing relationships, special circumstances, and at the Adviser's discretion.

The Adviser reserves the right to decline to provide advisory services to any person or firm in its sole discretion and for any reason.

ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

The Adviser believes each client presents a unique set of goals, values, interests, objectives, time horizons and challenges. George Papadopoulos, CPA/PFS, CFP® provides individualized attention to each type of investor who engages the Adviser for services.

Based upon information provided by the client, the Adviser attempts to evaluate an investor's risk tolerance, time horizon, goals and objectives through an interview and data-gathering process in an effort to determine an investment plan or portfolio to best fit the investor's profile. Client participation and the client's delivery of accurate and complete information are critical to the Adviser's process. In performing its services, the Adviser shall not be required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information.

The Adviser may recommend the services of himself in his capacity as an investment manager and Certified Public Accountant, as well as other professionals to implement recommendations. Any professional referrals *(i.e.,* insurance agents/firms, accounting professionals, legal professionals, etc.) are *solely* a courtesy and the Adviser receives no direct or indirect compensation as a result of referrals. Clients are welcome but are never under any obligation to act upon any of the recommendations made by the Adviser or to engage the services of any such recommended service firm or professional(s) including the Adviser itself.

The Adviser provides individualized Wealth Management Services to its clients. The Adviser can provide advisory services for portfolios ranging from conservative to aggressive, each designed to meet the varying needs of and within the direction set forth by the investors. The Adviser and client work together to devise a portfolio best suited to their individual needs after clients have defined their objectives, risk tolerance and time horizons and the selection is approved by the client.

The Adviser generally utilizes the following:

1. Fundamental Analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. The following data relating to fundamental analysis is provided for your information.

Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security. For example, an investor can perform fundamental analysis on a bond's value by looking at economic factors, such as interest rates and the overall state of the economy, and information about the bond issuer, such as potential changes in credit ratings. For assessing stocks, this method uses revenues, earnings, future growth, return on equity, profit margins and other data to determine a company's underlying value and potential for future growth.

Very broadly described, this type of analysis involves a method of evaluating a security that entails attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and company-specific factors (like financial condition and management).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

This method of security analysis is generally considered to be the opposite of technical analysis.

Fundamental analysis is performed on historical and present data, but with the goal of making financial forecasts. There are several possible objectives:

- to conduct a company stock valuation and predict its probable price evolution,
- to make a projection on its business performance,
- to evaluate its management and make internal business decisions,
- to calculate its credit risk.

Fundamental analysis is not without its drawbacks and problems. For one, this method can be tedious and time consuming. Once a trend in the fundamentals of the company is established, normally, the future growth will be extrapolated using that trend. The extrapolation is a subjective exercise and should be cautiously assessed. As an example, the trend may still be up but the market may already be saturated and thus there is a higher chance of the trend flattening rather than continuing upward. Extrapolation may not always work and may result in a wrong call. Additionally, fundamental analysis involves a time delay as the financial data the analyst is reviewing is always from the previous year or previous quarter. Additionally, even if a fundamentally strong company at the right price is identified, it does not mean that the company's shares are going to move anytime soon. Therefore, some holdings may need to be held for quite some time.

A stock's position in the market is also driven by investor sentiment, which can sometimes swing in extremes. As a result, stock prices of companies can reach extremely overvalued levels or extremely undervalued levels. When the share price becomes overvalued, a fundamental analyst will stay out or they will exit too early. As the share price reaches extremely overvalued levels, the fundamental analyst might miss out the biggest gain in the share price. This type of analyst may also buy when the price drops within a value range and yet the stock price could head lower still well into oversold regions before recovering. Funds with underlying stock investments can also be impacted.

As with any data produced by a third party, there is always the possibility that the company's data has been manipulated. Enron is a good example. It does happen and it can be very difficult to detect. Thus, an analyst is limited by the information that is published.

2. Other. The Adviser's investment strategies may be based upon a number of concepts and determined by the type of investor as services are customized for each individual client.

The basis for the Adviser's investment recommendations is the Nobel Prize winning investment strategy called "Modern Portfolio Theory ("*MPT*"). MPT is a sophisticated investment decision approach that permits an investor to classify, estimate and control both the kind and the amount of expected risk and return. Fundamental to MPT is the ability to statistically quantify the relationship between risk and return, thus determining the extent of compensated risk.

George Papadopoulos, CPA/PFS, CFP® takes the position that risk reduction is a key element to long-term investment success therefore the Adviser generally implements plans by using strategic diversified asset allocation. Strategic Asset Allocation is a lifetime investment approach, wherein selected asset classes and the weightings of these asset classes focus on the overall investment objective and risk tolerance of the client.

The concept of asset allocation or spreading investments among a number of asset classes (domestic equities v. foreign equities; large cap stocks vs. small cap stocks; growth stocks v. value stocks; municipal bonds vs. corporate bonds vs. government bonds) is the Adviser's guiding strategy.

Negative asset class correlation (the measure of the degree of movement between investments) of the varying asset classes within the portfolio is carefully analyzed to help reduce volatility without sacrificing the effectiveness of the portfolio in an effort to achieve expected yields.

Strategic Asset Allocation is a relatively passive investment style, wherein the assets and weightings are set and remain relatively unchanged. This strategy places a great emphasis on minimizing portfolio turnover and trading/transaction costs.

Recommendations for or purchases of investments will be based on publicly available reports and analysis. In the case of mutual funds, recommendations will be based on reports and analysis of performance and managers, and certain computerized models for asset allocation and investment timing. Tactical asset allocation (actual attempted timing of the market, stock selection and track record investment) is greatly discouraged.

Portfolio holdings or recommendations are generally judged by (managers' or investments') experience, track record and performance of like-kind investments. The Adviser will actively manage each portfolio. Investors should expect to remain fully invested within the ranges of their selected asset allocation plan at all times unless restated by the client. The Adviser generally looks to the long-term when developing advice and recommendations based upon information provided by the client.

Of course, no single theory or strategy can guarantee success.

It is important that the client promptly notifies the Adviser of any change in the client's financial condition so the Adviser has the opportunity to assess any possible changes needed in the advice, recommendations or investment strategies. Changing conditions in the client's financial life or significant changes in market conditions may warrant a collaborative effort with the client to modify their strategic investment framework, which consequently may also trigger changes to investment holdings within the portfolio.

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

B. MATERIAL RISKS INVOLVED

George Papadopoulos, CPA/PFS, CFP® takes the general position that investors with diverse portfolios have a better chance of making a profit because it is difficult to accurately predict the movement of the economy.

Obviously, no single strategy can be relied upon to outperform the market. As outlined below, the Adviser's goal in its analysis is not to time the market.

George Papadopoulos, CPA/PFS, CFP® primarily utilizes long-term trading and rarely uses short-term trading. Even less frequently, margin and option transactions may be utilized.

George Papadopoulos, CPA/PFS, CFP® seeks to utilize investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Short sales, margin transactions and options writing generally hold greater risk and clients should be aware that there is a chance of material risk of loss using any of those strategies.

Clients may make additions to and withdrawals from the account at any time, subject to the Adviser's right to terminate an account. Clients may withdraw account assets on notice to the Adviser, subject to the usual and customary securities settlement procedures. The Adviser generally designs its client portfolios as long-term investments and assets withdrawals may impair the achievement of a client's investment objectives. Additions may be in cash, cash equivalents and securities provided that the Adviser reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. The Adviser may consult with its clients about the options and ramifications of transferring securities when provided pre-notification of the client's intentions. In such cases, clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level *(i.e.,* contingent deferred sales charge) and/or tax ramifications.

Clients may choose to make self-directed securities transactions, which are investments that are not reviewed and/or not recommended by the Adviser. In such cases, the Adviser has not passed on the suitability of said investments and while the Adviser may assist with client-directed implementation as a value-added service at the client's request, the Adviser will not manage these types of investments unless agreed in writing.

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

C. RISKS OF SPECIFIC SECURITIES UTILIZED

George Papadopoulos, CPA/PFS, CFP® generally seeks investment strategies that do not involve significant risk or unusual risk beyond that of the general domestic and / or international equity markets.

Investments in individual stocks can be risky. Some risks can be controlled and some risks can be guarded against but no investment strategy can carry guarantees from loss. Certain market risks cannot be controlled, such as market or economic conditions. Certain strategies may be employed to adjust portfolios or the Adviser and client may agree to hold the portfolio's course. The Adviser generally designs portfolio strategies for the long-term, unless otherwise specifically requested in writing. Therefore, the Adviser does not attempt to time the market.

Investments in mutual funds may bear a risk of investment loss. Clients who invest should also be prepared to bear a loss of investment proceeds.

Thoughtful investment selections that meet a client's stated goals and risk profile may help keep individual stock and bond risks at an acceptable level.

Fixed income investments generally are utilized as a portfolio diversification element as well as for income deriving investments outside of equity exposure.

The Adviser does *not* recommend Mortgage-backed/Asset-backed securities (MBS/ABS).

There are certain risks involved in investing in all types of bonds: Government, Municipal, and Corporate. The following is an overview of the types of risks that one should consider in terms of bond investments: Interest rate risk; reinvestment risk; inflation risk; mark risk, selection risk, timing risk, and price risk.

Additional risks for some government agency, corporate and municipal bonds may include: Legislative risk (a change in the tax code could affect the value of taxable or tax-exempt interest income); Call risk (some corporate, municipal and agency bonds have a "call provision" entitling their issuers to redeem them at a specified price on a date prior to maturity). Declining interest rates may accelerate the redemption of a callable bond, causing an investor's principal to be returned sooner than expected. In that scenario, investors have to reinvest the principal at the lower interest rates.

If the bond is called at or close to par value, as is usually the case, investors who paid a premium for their bond also risk a loss of principal. In reality, prices of callable bonds are unlikely to move much above the call price if lower interest rates make the bond likely to be called. Additionally, there may be a liquidity risk involved if investors may have difficulty finding a buyer when they want to sell and may be forced to sell at a significant discount to market value. Liquidity risk is greater for thinly traded securities such as lower-rated bonds, bonds that were part of a small issue, bonds that have recently had their credit rating downgraded or bonds sold by an infrequent issuer. Bonds are generally the most liquid during the period right after issuance when the typical bond has the highest trading volume.

Additional risks for corporate and municipal bonds may include: Credit risk; default risk; event risk and duration risk.

Past performance is not a guarantee of future returns. Investing in securities involves A risk of loss that all clients should be prepared to bear.

ITEM 9: DISCIPLINARY INFORMATION

George Papadopoulos, CPA/PFS, CFP® has not been involved in any legal or disciplinary events. The Adviser has not been involved in any criminal or civil actions; administrative proceedings before the SEC or any other federal, state of foreign regulatory authority.

George Papadopoulos, CPA/PFS, CFP® has not been involved in any self-regulatory organization proceedings.

The Adviser's record does not reflect the existence of any data that would be material to a client's or prospective client's evaluation of George Papadopoulos, CPA/PFS, CFP® or the integrity of its management.

Information pertaining to George Papadopoulos, CPA/PFS, CFP® is contained on ADV Part 2B which is attached to this section.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

The Adviser is not a broker/dealer firm. George Papadopoulos, CPA/PFS, CFP® is not a registered representative of a broker/dealer.

B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR OR A COMMODITY TRADING ADVISER

George Papadopoulos, CPA/PFS, CFP® is not registered as a FCM, CPO or a CTA.

C. REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND CONFLICTS OF INTEREST

George Papadopoulos, CPA/PFS, CFP® does not have any material relationships that would present a possible conflict of interest with any registered entities.

George Papadopoulos, CPA/PFS, CFP® is a Certified Public Accountant. However, accounting and tax services are not offered to the general public. Clients are welcome but are never obligated to utilize the Adviser's tax preparation services.

George Papadopoulos, CPA/PFS, CFP® does not operate and does not have a material relationship with a hedge fund or other type of private pooled investment vehicle.

The Adviser does not maintain registration relations with any of the following:

- broker-dealer, municipal securities dealer, or government securities dealer or broker
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- other investment adviser or financial planner
- futures commission merchant, commodity pool operator, or commodity trading adviser
- banking or thrift institution
- lawyer or law firm

- insurance company or agency
- pension consultant
- real estate broker or dealer
- sponsor or syndicator of limited partnerships

D. SELECTION OF OTHER ADVISERS OF MANAGERS AND HOW ADVISER IS COMPENSATED FOR THOSE SELECTIONS

The Adviser does not utilize nor select other advisers or third-party managers. All assets are managed by George Papadopoulos, CPA/PFS, CFP®.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. CODE OF ETHICS

George Papadopoulos, CPA/PFS, CFP® takes the issue of regulatory compliance seriously and is committed to maintain compliance with state and applicable federal securities laws. Additionally, the Adviser has a position of public trust and it is our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable.

George Papadopoulos, CPA/PFS, CFP® places great value on ethical conduct. Therefore, the ultimate goal of our internal policies is to challenge the Adviser to live up not only to the letter of the law, but also to the ideals set forth by the Chief Compliance Officer of the Adviser.

Clients may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered Investment Adviser, George Papadopoulos, CPA/PFS, CFP® is a fiduciary to each and every client.

As fiduciaries, Investment Advisers owe their clients several specific duties. According to the SEC, an Investment Adviser's fiduciary duties include:

- Providing advice that is suitable based upon what we know about our clients;
- Providing full disclosure of material facts and potential conflicts of interest (such that the client has complete and honest disclosure in order to make an informed decision about services of the Adviser and about investment recommendations);
- The utmost and exclusive loyalty and good faith;
- Best execution of transactions under the available circumstances;
- The Adviser's reasonable care to avoid ever misleading clients;
- Only acting in the best interests of clients.

It is the Adviser's policy to protect the interests of each of the Adviser's clients and to place the clients' interests first and foremost in each and every situation.

George Papadopoulos, CPA/PFS, CFP® will abide by honest and ethical business practices to include, but is not limited to:

- The Adviser will not induce trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account.
- The Adviser will make investment decisions with reasonable grounds to believe that the decisions are suitable for the client on the basis of information furnished by the customer and the Adviser's documentation.
- The Adviser and Advisory Representatives will not borrow money from clients.
- The Adviser will not recommend the purchase of a security without the reasonable belief that the security is registered, or the security or transaction is exempt from registration in states where we provide investment advice and based upon information the Adviser receives.
- The Adviser will not recommend that the client place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of a broker/dealer that is not licensed, based upon information available to the Adviser.
- The staff (if/when applicable) of the Adviser will report all required personal securities transactions to George Papadopoulos, CPA/PFS, CFP®, the Chief Compliance Officer as required. Reportable trades for this Adviser include all but the following exceptions:

    - Transactions effected pursuant to an automatic investment plan;
    - Securities held in accounts over which the access person has no direct or indirect influence or control;
    - Transactions and holdings in direct obligations of the Government of the United States;
    - Money market instruments — bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments;
    - Shares of money market funds;
    - Transactions and holdings in shares of mutual funds are not reportable, since the Adviser does not have a material relationship with an investment company which would otherwise require reporting;
    - Transactions in units of a unit investment trust are not reportable if the unit investment trust is invested exclusively in unaffiliated mutual funds.

All applicable securities rules and regulations will be strictly enforced. George Papadopoulos, CPA/PFS, CFP® will not permit and has instituted controls against insider trading.

Advisory Representatives and administrative personnel (if / when applicable) who do not follow the Adviser's Code of Ethics or who in any way violate securities rules and regulations, or who fail to report known or suspected violations will be disciplined or terminated, depending upon severity. Such persons could also face action by the SEC and/or state securities regulators.

The Adviser emphasizes the unrestricted right of clients to decline to implement any advice rendered, in whole or part. Where the Adviser is granted discretionary authority of the client's accounts, clients are welcome to set investment parameters and/or limitations in writing and such direction is followed until such time the client's instructions are amended in writing.

Clients are welcome to request a copy of the Adviser's Code of Ethics by contacting the Adviser's office.

B. RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS

The Adviser does not recommend that clients buy or sell any security in which any of the Adviser or its related persons have a material financial interest.

C. INVESTING PERSONAL MONIES IN THE SAME SECURITIES AS CLIENTS

The Adviser and/or individuals associated with the Adviser may have similar investment goals and objectives and as a result may buy or sell securities for their personal accounts that may be identical to or different from those recommended to clients. Thus, at times the interests of the Adviser's or staff members' accounts may coincide with the interests of clients' accounts. However, at no time will the Adviser or any related person receive an added benefit or advantage over clients with respect to these transactions nor will the Adviser nor its associated persons will not place itself in a position to have added benefit as a result of advice given to clients.

D. TRADING SECURITIES AT/AROUND THE SAME TIME AS CLIENTS

The Adviser and its staff acknowledge the Adviser's fiduciary responsibility to place the investment needs of clients ahead of the Adviser and its staff. The interests of clients are held in the highest regard. At no time will the Adviser or any related person receive an added benefit or advantage over clients with respect to these transactions. The Adviser and its associated persons will not place itself in a position to have added benefit as a result of advice given to clients.

The staff of the Adviser shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry.

The Adviser has established trading policies for its access persons. George Papadopoulos, CPA/PFS, CFP® is responsible for the monitoring of personal trading conducted by staff.

ITEM 12: BROKERAGE PRACTICES

A. FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS

Consultation clients are welcome to implement recommendations, in whole or in part, through the financial services firms of their choice.

George Papadopoulos, CPA/PFS, CFP® is a fee-only investment adviser and as such, is not a registered representative of any broker/dealer firm. The Adviser utilizes the services of Charles Schwab & Co., Inc. (“*Charles Schwab & Co*”) for its advisory transactions and participates in the custodial firm’s institutional program for independent advisers.

The recommendation of Charles Schwab & Co. to clients is based on excellent client services, discount rates, product offerings, execution services available and services available to the Adviser. The Adviser recognizes its duty to best execution for its clients under the circumstances available. The decision to utilize the preferred service providers is based upon the customer service provided to investors and the services available to the Adviser. While it is possible that clients may pay higher commission or transactions fee through the preferred service providers, the Adviser has determined that these firms currently offer the best overall value to the Adviser and its clients for the brokerage and technology it provides.

The Adviser periodically reviews other alternatives that are available to the Adviser market. However, George Papadopoulos, CPA/PFS, CFP® takes the position that excellent customer service and trade execution is superior to most non-service oriented, discount and internet/web based brokers that may otherwise be available to the public. Charles Schwab & Co. features a broad line of products and services that are available to every investor, regardless of the amount of investable assets. The Adviser also considers the following criteria:

- Quality of overall execution services provided;
- Promptness of execution;
- Creditworthiness and financial condition;
- Research (if any) provided;
- Promptness and accuracy of reports on execution;
- Ability and willingness to correct errors;
- Promptness and accuracy of confirmation statements;
- Ability to access various market centers;
- The broker-dealer's facilities and technology;
- The market where the security trades;
- Any expertise in executing trades for the particular type of security;
- Commission charged;
- Reliability of the broker-dealer;
- Ability to use ECNs to gain liquidity, price improvement, lower commission rates and anonymity;
- Reputation of the broker-dealer;
- Execution and operational capabilities of the broker-dealer

Charles Schwab & Co. is a large and sophisticated order sender. The firm indicates in its execution disclosure that they monitor execution quality through a regular and rigorous review of the execution quality received from the venues where the firm routes equity and option orders. Additionally, the firm indicates in its execution policies that it continually monitors alternative venues to identify opportunities for improving execution quality. Among the factors the service providers consider include: The amount of net price improvement, speed of execution, certainty of execution, cost of execution, service issues, reliability, credit worthiness of counterparties, and accessibility. Generally, the larger service providers compare the reported executions and unexecuted orders to the National Best Bids and Offers (NBBO's) at the time of order entry and identify a subset of items that require review.

Charles Schwab & Co. utilizes a proprietary program and routing technology which dynamically sends orders to different market centers that seek to fill orders quickly and at the best available price. When routing orders, Charles Schwab & Co. seeks execution of at a price better than the NBBO. That means executing the order below the best offer for buys or above the best bid for sells. If an order executes at a price outside the NBBO and isn't justified, Charles Schwab & Co. indicates it may take action and request a price adjustment from the market center. Some prices outside the NBBO are justified due to market volatility or trade volume. Charles Schwab & Co. indicates this is why it consistently monitors trades to identify those executed outside the NBBO and looks for opportunities to improve the price.

Market volatility, volume and system availability may delay account access and trade executions. Price can change quickly in fast market conditions, resulting in an execution price different from the quote displayed at order entry. Execution price, speed and liquidity and account access are affected by many factors, including market volatility, size and type of order and available market centers.

The Adviser has access to execution information from the service provider upon request or via the Internet. The SEC requires brokerage firms to make publicly available their order routing practices via quarterly reports. The report is to provide information on routing non-directed orders (any order that the customer or Adviser has not specifically instructed to be routed to a particular venue for execution). For non-directed orders, the service providers will select the venue. Note: Brokerage firms are required to disclose any material arrangements with the venues utilized, including but not limited to any internation or payments for order flow arrangements. Clients are welcome to obtain copies of these reports if desired.

Advisory clients should also evaluate service providers before opening an account since they are welcome to select their preferred firm. While it is possible that clients may pay higher commissions or transaction fees through its preferred service provider, the Adviser has determined it currently offers the best overall value to the Adviser and clients for the brokerage, service, and technology provided. The Adviser periodically reviews other alternatives that are available to the Adviser market.

1. RESEARCH AND OTHER SOFT DOLLAR BENEFITS

The Adviser participates in the Charles Schwab & Co.'s institutional program for independent investment advisers. While there is no direct linkage between the investment advice given and the participation in a custodial firm's institutional program, economic benefits are received which would not be otherwise, if the Adviser did not give advice to clients.

In fulfilling its duties to its clients, the Adviser endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the Adviser's receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence the Adviser's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

The Adviser may receive the following benefits from Charles Schwab & Co. (the typical service benefits of the institutional service for independent advisers): Customized statements; receipt of duplicate confirmations and statements; access to a trading desk servicing investment adviser program participants exclusively; access to block trading which provides the ability to aggregate and allocate securities transactions; ability to deduct investment advisory fees directly from client accounts; access to an electronic communication network (and software) for client order entry and account information; access to mutual funds which generally require significantly high minimum initial investments and those otherwise only available to institutional investors; reporting features; receipt of regulatory compliance communications; and perhaps discounts on business-related products. While the custodial firm does not directly provide any research, it may make available to the Adviser various free or discounted research products or subscriptions. Any general research received is used for the benefit of all clients. The software and related systems support may benefit the Adviser, but may not benefit clients directly.

The Adviser may receive the aforementioned services because the Adviser provides Wealth Management to clients who maintain assets at Charles Schwab & Co.

2. BROKERAGE FOR CLIENT REFERRALS

George Papadopoulos, CPA/PFS, CFP® does not receive referrals from any broker/dealer or third party in exchange for using that broker/dealer or third party.

3. CLIENTS DIRECTING WHICH BROKER/DEALER/CUSTODIAN TO USE

The Adviser does not participate in client-directed brokerage.

B. AGGREGATION (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS

Due to the individualized nature of the Adviser's services, transactions for each client generally will be effected independently, unless the Adviser decides to purchase or sell the same securities for several clients at approximately the same time. The Adviser may but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among the Adviser's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Due to the individualized nature of services, large orders of securities are not always consistent with the nature of the Adviser's services. Aggregation is undertaken in firms processing large orders of securities in order to realize more effective trade execution and the cost efficiencies that come from executing larger order sizes. In each case, the Adviser strives to allocate investment opportunities among its clients in a manner that is fair and equitable based upon the client investment objectives.

Normally, under this procedure, when allocations are undertaken, transactions will generally be averaged as to price and allocated according to the Adviser's standard allocation procedure. This procedure considers the circumstances of each trade and strives for fairness and cost-effectiveness to the client. In most cases when the Adviser executes only a partial fill of a targeted buy order, allocations will prioritize complete fills for clients with the most available cash as a percentage of portfolio assets. Likewise, when the Adviser executes only a partial fill of a targeted sell order, allocations will prioritize complete fills for clients with the least available cash as a percent of portfolio assets. To the extent that the Adviser determines to aggregate orders for the purchase or sale of securities, including securities in which the Adviser may invest, the Adviser shall normally do so in accordance with applicable rules promulgated under the SEC's Investment Advisers Act and no-action guidance provided by the staff of the SEC. An allocation statement will be prepared, and any special circumstances or conditions will be outlined in connection with each event. The Adviser shall not receive any additional compensation or remuneration as a result of the aggregation.

Certain issues may impact the Adviser's allocation under the particular circumstances and in such cases, the allocation will be made based upon other relevant factors, which may include: (i) when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates; (ii) allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts; (iii) if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed); (iv) in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

The Adviser receives no additional benefit as a result of the proposed aggregation.

Trade error policy: On rare occasions, trade errors may occur. The Adviser's process is to correct trade errors via its trade error account established with the custodian. Charles Schwab & Co.'s policy on trade errors is to reimburse clients for any loss if the amount is $100 or less. If the loss is greater than $100 the Adviser will reimburse the client for a loss. Conversely, if there is any gain from the trade error, they are posted to the Adviser's trade error account. Therefore, by the fact that the Adviser retains any gains or has them netted out before paying any losses, the Adviser receives a benefit from this arrangement.

ITEM 13: REVIEW OF ACCOUNTS

A. FREQUENCY AND NATURE OF PERIODIC REVIEWS AND WHO CONDUCTS

The **Wealth Management Services** provided by George Papadopoulos, CPA/PFS, CFP® are ongoing and involve continuous review and advice regarding the client's investment portfolio and planning needs. The Adviser will conduct frequent internal reviews (no less than quarterly) of the client's portfolio. The timing of Internal portfolio reviews may also be guided by the underlying assets of the portfolio, individual circumstances as reasonably known by the Adviser, market conditions and the request of the client. Financial Planning reviews are available upon request for Wealth Management clients.

The Adviser requests that client reviews (via phone or in person) occur at least twice per year and, of course, at the client's request. However, the Adviser encourages frequent communications with the Adviser in order to continually review ongoing investment strategies. Clients are encouraged to call the office any time during business hours. Clients are obligated to notify the Adviser immediately if there is a change in the client's financial situation in order to provide the Adviser with the opportunity to review the updated information and determine if there needs to be a change in the investment strategies.

Clients who do not desire intensive Wealth Management Services may retain the Adviser on an hourly or project basis for **Consultation Services**, whereby the Adviser can provide advice without ongoing monitoring or reviews of the account. Consultation Services terminate upon the delivery of services. Advice provided during services may include recommendations for reviews or other follow-up services. It would be the client's responsibility to update his or her financial goals or investment strategies on his/her own or secure additional services from the Adviser under a new or amended Agreement.

B. REVIEWERS

Reviews are conducted by George Papadopoulos, CPA/PFS, CFP®, the Founder and Chief Compliance Officer of the Adviser.

C. FACTORS THAT MAY TRIGGER NON-PERIODIC REVIEWS

The timing of Internal portfolio reviews may also be guided by the underlying assets of the portfolio, individual circumstances as reasonably known by the Adviser, market conditions and the request of the client.

Reviews may also be triggered by material market, economic or political events. As noted in Item A above, reviews may also be triggered by reported changes in the client's financial situation (which may include but are not limited to: Termination of employment, physical relocation, inheritance or retirement).

D. CONTENT AND FREQUENCY OF REGULAR REPORTS

Clients can expect to receive confirmation statements from all transactions and a monthly/quarterly statement, directly from their custodial firm. The custodian's quarterly reports detail account value, net change, portfolio holdings, and all account activity.

The Adviser may prepare an annual investment portfolio report at the Adviser's discretion.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES FOR ADVICE RENDERED TO CLIENTS (INCLUDES SALES AWARDS OR OTHER PRIZES)

George Papadopoulos, CPA/PFS, CFP® does not receive any economic benefit, directly or indirectly from any third party in connection with advice rendered to the Adviser's clients.

B. COMPENSATION TO NON-ADVISORY PERSONNEL FOR CLIENT REFERRALS

The Adviser does not directly or indirectly compensate any person who is not part of the Adviser's personnel in exchange for client referrals.

The Adviser may pay a nominal fee to have its name and web site link listed on the NAPFA (National Association of Personal Financial Advisers) site or similar professional sites. However, this fee is not associated with compensation for referrals but is a marketing service only.

ITEM 15: CUSTODY

Execution of transactions and custody of client funds and securities is facilitated by Charles Schwab & Co., Inc., member SIPC.

George Papadopoulos, CPA/PFS, CFP® may maintain account log-in information for certain clients in order to provide requested services. This level of account access may be deemed to be custody of funds/securities. Therefore, the Adviser complies with custody requirements imposed on Advisers, including a surprise annual examination by an independent public accountant. The latest required annual Form ADV-E was filed with the regulator by the independent public accounting firm.

Clients can expect to receive regular and customary account statements from the custodian and should carefully review those statements. Clients can also receive Internet access to their accounts 24/7 in addition to their transactional, regular and customary account statements. Where fees are deducted, it is important that clients receive custodial statements directly. If clients find that statements are not being received directly, they should promptly contact George Papadopoulos, CPA/PFS, CFP® and their custodial firm.

In all cases, clients have a direct and beneficial interest in their securities (individual ownership), rather than an undivided interest in a pool of securities.

ITEM 16: INVESTMENT DISCRETION

Clients engaging the Adviser for Wealth Management Services have the ability to leave standing instructions with the Adviser to refrain from investing in particular industries, invest in limited amounts of securities and to re-balance portfolios (also termed as “limited discretion”).

With the client’s authorization as provided in the custodial account forms and the Adviser’s Client Agreement, George Papadopoulos, CPA/PFS, CFP® will maintain limited discretionary trading authority to execute securities transactions in the investor’s portfolio within investor’s designated investment objectives, to include the securities to be bought and sold, and the amount of securities to be bought and sold. The Adviser will never have full power of attorney. The Adviser may maintain account access (log-in) information to provide requested services to certain accounts (such as retirement accounts) as discussed at Item 15 of this Brochure. Lastly, the Adviser will maintain the ability to deduct contractually agreed investment advisory fees via investor’s qualified custodian but only with client authorization.

The Adviser also may provide non-discretionary management services to its clients relative to: (1) variable life/annuity products that they may own, and/or (2) their individual accounts held through employer-sponsored retirement plans. In so doing, the Adviser either directs or recommends the allocation of client assets among the various mutual fund subdivisions that comprise the variable life/annuity product or the retirement plan. The client assets shall be maintained at either the specific insurance company that issued the variable life/annuity product which is owned by the client, or at the custodian designated by the sponsor of the client’s retirement plan. Investments and service providers relative to Plan offerings are limited to only those available through the respective Plans and are determined by the Plan Sponsor(s).

ITEM 17: VOTING CLIENT SECURITIES (PROXIES)

Clients retain the authority to vote proxies. Proxy materials are sent to clients directly from the clients’ custodian. The Adviser requests that investors help to ensure that proxy ballots are mailed directly to each investor (vs. the Adviser) or an authorized third party (for managed assets, custodial account forms generally provide a section for proxy mailing data). The Adviser will not take action with respect to any securities or other investments that become the subject of any legal proceedings, including bankruptcies.

In the event the Adviser’s proxy advice is solicited, the Adviser shall only furnish consultations to existing clients. The Adviser will not solicit proxies from non-clients. When providing proxy advice to clients, the Adviser will disclose any material relationship with the issuer, its affiliates or a security holder proponent of the matter on which proxy voting advice is given, as well as any material interest of the Adviser in the matter. The Adviser will not accept any special fee or remuneration for furnishing voting advice from any person other than the security holder recipient thereof. The Adviser’s voting advice will not be provided on behalf of any person soliciting proxies, or on behalf of a participant in an election contest subject to SEC Rule 14a-11. The Adviser will never communicate with the press concerning a particular proxy. The Adviser does not solicit proxies and the Adviser recognizes that any deviations from these stated policies may require the Adviser to comply with SEC Proxy Registration Rules.

ITEM 18: FINANCIAL INFORMATION

A. BALANCE SHEET

George Papadopoulos, CPA/PFS, CFP® does not require nor solicit prepayment of more than $500 in fees per client, six months or more in advance of services and therefore is not required to include a balance sheet with this Brochure.

B. FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR THE ADVISER'S ABILITY TO MEET CONTRACTUAL COMMITMENTS TO CLIENTS

The Adviser does not have any financial condition that is likely to reasonably impair the Adviser's ability to meet contractual commitments to clients.

C. BANKRUPTCY PETITIONS IN PREVIOUS TEN YEARS

George Papadopoulos, CPA/PFS, CFP® has never been party to a bankruptcy petition.

ITEM 19: STATE REGULATED ADVISER DATA

A. Formal Education and Business Background Information and
B. Outside Business Activities

The disclosure information relating to Items 19.A & B is located in the attached ADV Part 2B.

C. Performance-Based Fees.

As outlined herein, the Adviser's fees are not "performance based" (based upon a share of capital gains or capital appreciation, or performance, for any portion of funds under an advisory contract).

D. Disciplinary / Disclosure Information

As reported in the attached ADV Part 2B, George Papadopoulos, CPA/PFS, CFP® does not have any record of disciplinary or disclosure events.

E. Relationships or Arrangements with Issuers of Securities.

The Adviser does not have any relationships or arrangements with issuers of securities.

GEORGE PAPADOPOULOS, CPA/PFS, CFP®

FOUNDER AND CHIEF COMPLIANCE OFFICER

FORM ADV PART 2B
INDIVIDUAL DISCLOSURE BROCHURE

This Brochure provides information about George Papadopoulos, CPA/PFS, CFP® and supplements the Adviser's ADV Part 2A Brochure. Please contact the office of George Papadopoulos, CPA/PFS, CFP® via the contact information listed below if you did not receive the Adviser's ADV Part 2A Brochure or if you have any questions about the contents of this supplement. Additional information about George Papadopoulos, CPA/PFS, CFP® is available on the SEC's website at www.adviserinfo.sec.gov. Registration does not imply a certain level of skill or training.

Mr. Papadopoulos' CRD number is: 2499573

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March 14, 2024

Item 1: Cover Page

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

GEORGE PAPADOPOULOS, CPA/PFS, CFP®
FOUNDER AND CHIEF COMPLIANCE OFFICER
Year of Birth: 1967

Designations and Examinations:
State of Michigan: Certified Public Accountant (CPA) 1993
American Institute of Certified Public Accountants: Personal Financial Specialist (PFS) 1996
Certified Financial Planner Board of Standards, Inc.: Certified Financial Planner™ (CFP®) 1995

Post Secondary Education:
Eastern Michigan University
M.S.A. Accounting
B.B.A. Business (with honors)

Recent Business:
George Papadopoulos, CPA/PFS, CFP®, Novi, MI, Founder and Chief Compliance Officer
Registered Investment Adviser 1998 – Present
Certified Public Accountant

Prior to starting his financial planning practice, Mr. Papadopoulos spent three years at Deloitte & Touche, LLP dealing with individual taxation and personal financial planning for high net worth individuals, corporate executives, small business owners and a wide variety of other clients. Before that time, Mr. Papadopoulos spent three years working at a local CPA practice dealing with individual, corporate and partnership taxation and small business accounting. He was also licensed to sell securities and insurance products, but rarely engaged in this activity.

Travel Blogger Buzz LLC, Ann Arbor, Michigan
Author 2012 - Present

Professional Organizations:
Mr. Papadopoulos is a member of the American Institute of Certified Public Accountants (AICPA) and the Michigan Association of Certified Public Accountants (MACPA). He also belongs in the Personal Financial Planning section of the AICPA. Additionally, Mr. Papadopoulos is a member of the National Association of Personal Financial Advisers (NAPFA) and a member of the National Association of Tax Preparers (NATP).

INFORMATION ABOUT THE CFP® DESIGNATION

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to obtain the certification. It is recognized in the United States (U.S.) and a number of other countries for its:

1) high standard of professional education;
2) stringent code of conduct and standards of practice; and
3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor's degree from a regionally accredited U.S. college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The exam, administered in 10 hours over a 2-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Note: The Certified Financial Planner™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

INFORMATION ABOUT THE CPA LICENSE

The requirements to obtain a Certified Public Accountant (CPA) license vary by state. CPAs are licensed by the state board of accountancy. Applicants must meet educational and experience requirements as well as pass the required uniform examination. Additionally, licensees must comply with continuing professional education requirements. Additional information about licensing requirements and the Adviser’s outside business activities as a CPA, please contact George Papadopoulos, CPA/PFS, CFP® or visit the State of Michigan’s web site (Michigan.gov)’s Department of Energy, Labor & Economic Growth (Licensing).

All American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA’s *Code of Professional Conduct* within their state accountancy laws or have created their own.

THE PERSONAL FINANCIAL SPECIALIST (PFS) DESIGNATION

The Personal Financial Specialist (PFS) credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning.

To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA.

A PFS credential holder is required to adhere to AICPA’s *Code of Professional Conduct*, and is encouraged to follow AICPA’s *Statement on Responsibilities in Financial Planning Practice*. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

THE NATIONAL ASSOCIATION OF PERSONAL FINANCIAL ADVISERS (NAPFA) STANDARDS OF MEMBERSHIP

Standards of Membership and Affiliation
Applicants for any category of membership (Members) or affiliation (Affiliates) with NAPFA must meet the following standards to be considered for admission, and must continue to abide by such standards in order to maintain eligibility and good standing in NAPFA.

1. NAPFA's Definition of a Fee-Only financial planner
NAPFA defines a Fee-Only financial adviser as an adviser who is compensated solely by the client with neither the adviser nor any related party receiving compensation that is contingent on the purchase or sale of a financial product. Neither Members nor Affiliates may receive commissions, rebates, awards, finder's fees, bonuses or other forms of compensation from others as a result of a client's implementation of the individual's planning recommendations. "Fee-offset" arrangements, 12b-1 fees, insurance rebates or renewals and wrap fee arrangements that are transaction based are examples of compensation arrangements that do not meet the NAPFA definition of Fee-Only practice.

2. Prohibition of Certain Ownership Interests and Employment Relationships
Neither a member nor an affiliate may own more than a 2% interest in, or be employed by, a financial services industry firm (see definition below) that receives transaction based compensation as prohibited by the NAPFA Standards of Membership and Affiliation.

A related party (see definition below) to a member or an affiliate may not own more than a 2% interest in a financial services industry firm that receives transaction based compensation as prohibited by NAPFA; and to whom the member or affiliate makes referrals or otherwise directs business.

Financial services industry firm includes any entity or individual that offers any type of financial service, e.g., securities broker or dealer, investment adviser, asset manager, investment company, banking institution, savings institution, trust company, mortgage bank, credit union, savings and loan association, insurance broker or dealer or agent, real estate broker or agent, commodities broker or dealer or agent. Related party means a household member with whom a member or affiliate shares income or economic benefits.

3. Compliance with NAPFA Standards and Industry Regulations
Members and Affiliates:

- Must abide by the NAPFA Code of Ethics, Standards of Membership and Affiliation, Bylaws, resolutions adopted by the Board and all rules set forth in the NAPFA Policies and Procedures Manual.

- Agree to comply with all federal and state statutes, rules, regulations, administrative and judicial rulings, and other authorities applicable to the provision of financial planning or advisory related services.

- Agree that they will make all appropriate filings, amendments and renewals as appropriate to required filings with regulatory authorities. This shall include, but is not limited to, Form ADV. As a condition of NAPFA membership, any and all Form ADV filings may be reviewed by the Membership Task Force.

4. Prompt notification of certain disciplinary and legal events.
Members and Affiliates have a continuing obligation to inform the NAPFA National Office, in a prompt manner and in writing, of significant disciplinary and legal events. These events include, but are not limited to, the following:

- any disciplinary inquiry or proceeding initiated by any federal, state or local civil or criminal authority or regulatory body, including any inquiry or proceeding relating to the firm with which the individual is associated;
- any disciplinary inquiry or proceeding initiated by a credentialing or membership organization or authority to which the individual is subject, e.g., Certified Financial Planner Board of Standards, State Board of Public Accountancy;
- any bankruptcy, receivership, or other type of assignment or arrangement for the benefit or protection of creditors of the individual or any entity in which the individual holds an interest of 5% or more.

NAPFA reserves the right to decline membership if the applicant has failed to comply with statutes or regulations governing the profession or has been unsuccessful in the defense of civil claims arising from professional services, unless such violations or claims are not material.

Membership Requirements for NAPFA-Registered Financial Advisers:

Fiduciary Standard: The adviser shall exercise his/her best efforts to act in good faith and in the best interests of the client including:

- Always act in good faith and with candor.
- Be proactive in disclosing any conflicts of interest that may impact a client.
- Not accept any referral fees or compensation contingent upon the purchase or sale of a financial product.

Advice across Disciplines: NAPFA-Registered Financial Advisers are broadly trained to bring together and apply the separate disciplines comprising personal finance—income tax, financial position and cash flow, retirement preparation, estate planning, investments, and risk management. NAPFA-Registered Financial Advisers and their associated firms help clients by offering a full range of coordinated advice on issues surrounding a client’s personal financial situation—not limiting their advice to marketable financial assets alone. NAPFA-Registered Financial Advisers work in a variety of business models to apply their approach—private wealth management, family and multi-family offices, trust departments, accounting firms, ensemble financial planning firms, and solo professional practices—where compensation is by fee-only—always. To maintain and enhance technical skill across disciplines, NAPFA-Registered Financial Advisers are committed to lifelong learning.

Education: Bachelor’s degree, in any discipline from an accredited institution.

Specialized Education Requirement: As of January 1, 2010 NAPFA requires the Certified Financial Planner (CFP) credential to meet the advanced, broad-based education in financial planning requirement for new NAPFA-Registered Financial Advisers. Additionally, NAPFA will accept the CPA/PFS to meet this requirement, provided the applicant has attained the credential by taking the comprehensive exam offered by the AICPA.

Peer Review: Applicants for NAPFA-Registered Financial Adviser status may select one of three pathways for peer review:

Case submission. The applicant may submit a case which documents work performed for an actual client over a service cycle completed within the 12 months prior to submission. The case does not need to be written but must be documented. The case should follow NAPFA's current peer review checklist and should meet the following guidelines:

It must summarize all relevant facts and financial data for the client; identify the client's values, goals, and needs; provide a list of client problems, issues and opportunities that were addressed; summarize specific recommendations, including rationale and supporting documentation, and how the recommendations were implemented.

It must address, or document consideration of, all the following functional areas of personal finance: income tax, financial position and cash flow, retirement planning, estate planning, investments, and risk management.

It must show evidence of applying an integrated approach, tying together issues and opportunities across all of the functional areas listed above

Traditional written Financial Plan submission. The applicant may submit a traditional written financial plan. The plan, which must be prepared within the 12 months prior to submission, must meet the following guidelines:

The plan must apply an approach to advisory services that includes: collection and assessment of all relevant data from the client, identification of client goals, identification of client financial problems, provision of recommendations, assistance in implementation of the recommendations, and the offer of periodic review.

The plan must address all of the following factors: income tax, cash flow, retirement planning, estate planning, investments, risk management, and any special needs planning.

The plan must be either the author's original work product or a plan created under the supervision of the applicant and should follow the current peer review checklist. It may reflect an actual client case or a fictitious case.

Financial Plan based on a fact pattern provided by NAPFA. The applicant may submit a traditional written financial plan using a fact pattern provided to them by NAPFA. The plan, which must be prepared within the 12 months prior to submission, must meet the following guidelines:

The plan must apply an approach to advisory services that includes: collection and assessment of all relevant data from the client, identification of client goals, identification of client financial problems, provision of recommendations, assistance in implementation of the recommendations, and the offer of periodic review.

The plan must address all of the following factors: income tax, cash flow, retirement planning, estate planning, investments, risk management, and any special needs planning.

The plan must be either the author's original work product or a plan created under the supervision of the applicant and should follow the NAPFA current peer review checklist. It may reflect an actual client case or a fictitious case.

NAPFA's Continuing Education Requirement is Two-Fold: 60 hours total
32 core hours include a minimum of five credit hours in each of the following core areas: Insurance & Risk Management, Investments, Income Tax Planning, Retirement Planning & Employee Benefits, Estate Planning, and Communications & Counseling; and a minimum of 2 hours in Ethics of Financial Planning. The 28 additional hours may be earned in either seven elective or five core areas.

ITEM 3: DISCIPLINARY INFORMATION

George Papadopoulos, CPA/PFS, CFP® has no record of legal or disciplinary events. His registration records contain no information that would be material to a client's or prospective client's evaluation of Mr. Papadopoulos or the integrity of his practice.

Mr. Papadopoulos has not been involved in any issues involving criminal or civil actions; administrative proceedings before the SEC or any other federal, state or foreign regulatory authorities. Mr. Papadopoulos has also not been involved in any self-regulatory organization proceedings.

Disclosure background on representatives can be located via the Investment Adviser Registration Depository's public data site which is located at the following link: *www.adviserinfo.sec.gov*

ITEM 4: OTHER BUSINESS ACTIVITIES

George Papadopoulos, CPA/PFS, CFP® is otherwise engaged as a Certified Public Accountant. The time spent on this activity may vary throughout the year but may involve up to 1/6 of his workweek.

George Papadopoulos, CPA/PFS, CFP® is otherwise engaged in contributing original works to financial industry publications (paid and unpaid services). The time spent on this activity may vary throughout the year but may involve up to 5% of his time.

Mr. Papadopoulos is the Managing Member of Travel Blogger Buzz LLC. The time spent on this activity may also vary throughout the year but may involve up to 10% of his time.

ITEM 5: ADDITIONAL COMPENSATION

Other than salary, Mr. Papadopoulos does not receive any economic benefit from any person, company or organization, either directly or indirectly, in exchange for providing clients with advisory services through this sole proprietorship.

ITEM 6: SUPERVISION

As the sole owner and representative, Mr. Papadopoulos has a vested interest in the firm's internal compliance and risk management program. The Adviser takes the issue of compliance and risk management seriously. Clients are welcome to contact the Adviser with questions or concerns in connection with the Adviser's services and internal compliance program. Mr. Papadopoulos' contact information is listed on the first page of this Brochure.

ITEM 7: STATE REGULATED ADVISERS ADDITIONAL DISCLOSURE DATA

George Papadopoulos, CPA/PFS, CFP® has not been involved in any arbitration claims, civil, self-regulatory organization or administrative proceedings of any kind. Mr. Papadopoulos has not ever been the subject of a bankruptcy petition.